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2                   **IN THE UNITED STATES DISTRICT COURT**  
3                   **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

4                   **IN RE: 23ANDME, INC. CUSTOMER DATA**  
5                   **SECURITY BREACH LITIGATION**

6                   Case No. 3:24-md-3098-EMC

7                   **[PROPOSED] ORDER APPOINTING**  
8                   **MICHAEL R. REESE, LAURA VAN**  
9                   **NOTE, AND RYAN CLARKSON AS**  
10                  **SETTLEMENT CLASS COUNSEL AND**  
11                  **INTERIM CO-LEAD CLASS COUNSEL**  
12                  **PURSUANT TO FEDERAL RULE OF**  
13                  **CIVIL PROCEDURE 23(G)**

14                  The Court, after considering the various Motions for Appointment of Interim Class Counsel  
15                  and related submissions and oral argument, hereby orders as follows:

- 16                  1. Michael Reese, Laura Van Note, and Ryan Clarkson are hereby appointed Settlement  
17                  Class Counsel and Interim Co-Lead Class Counsel (“Interim Co-Lead Counsel”).
- 18                  2. Interim Co-Lead Counsel must assume responsibility for the following duties during all  
19                  phases of this litigation.
  - 20                   a. Coordinating the work of preparing and presenting all of Plaintiffs’ claims and  
21                  otherwise coordinating all proceedings, including organizing and supervising the  
22                  efforts of Plaintiffs’ counsel in a manner to ensure that Plaintiffs’ pretrial  
23                  preparation is conducted effectively, efficiently, expeditiously, and economically;
  - 24                   b. Delegating work responsibilities and monitoring the activities of all Plaintiffs’  
25                  counsel in a manner to promote the orderly and efficient conduct of this litigation  
26                  and to avoid unnecessary duplication and expense;

- c. Calling meetings of Plaintiffs' counsel for any appropriate purpose, including coordinating responses to questions of other parties or of the Court, and initiating proposals, suggestions, schedules and any other appropriate matters;
- d. Determining (after consultation with other co-counsel as may be appropriate) and presenting (in briefs, oral argument, or otherwise) to the Court and opposing parties the position of the Plaintiffs on all matters arising during pretrial (and, if appropriate, trial) proceedings;
- e. Serving as the primary contact for all communications between Plaintiffs and Defendant, and acting as spokespersons for all Plaintiffs vis-à-vis Defendant and the Court;
- f. Directing and executing on behalf of Plaintiffs the filing of pleadings and other documents with the Court;
- g. Appearing at all court hearings and conferences regarding the case as most appropriate for effective and efficient representation and speaking for Plaintiffs at all such hearings and conferences;
- h. Receiving and initiating communication with the Court and the Clerk of the Court (including receiving orders, notices, correspondence and telephone calls) and dispensing the content of such communications among Plaintiffs' counsel.
- i. Initiating and conducting discussions and negotiations with counsel for Defendant on all matters, including settlement;
- j. Negotiating and entering into stipulations with opposing counsel as necessary for the conduct of the litigation;
- k. Initiating, coordinating and conducting all discovery on Plaintiffs' behalf and

ensuring its efficiency;

1. Selecting, consulting with and employing experts for Plaintiffs, as necessary;
  - m. Encouraging and enforcing efficiency among all Plaintiffs' counsel;
  - n. Assessing Plaintiffs' counsel for the costs of the litigation;
  - o. Preparing and distributing periodic status reports to the Court and to the parties as ordered;
  - p. Develop and recommend for Court approval practices and procedures pertaining to attorneys' fees and expenses and, on an ongoing basis, monitor and administer such procedures. At such time as may be appropriate, Interim Co-Lead Counsel also will recommend apportionment and allocation of any fees and expenses that might become due to Plaintiffs' counsel in this matter and;
  - q. Performing such other duties as are necessary in connection with the prosecution of this litigation or as may be further directed by the Court.

## **IT IS SO ORDERED.**

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Hon. Edward M. Chen  
U.S. District Judge